

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

ROCCO CIOFOLETTI, et al., on behalf
of themselves and all others similarly
situated,

Plaintiffs,

-vs-

SECURIAN FINANCIAL GROUP, INC.,
et al.,

Defendants.

Case No.: 0:18-cv-03025-JNE-ECW

PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

Plaintiffs, by and through counsel, hereby moves this Court for an order pursuant to Rules 23(a), (b)(2) and (b)(3) certifying this action as a class action pursuant to Rule 23(b)(2) and (b)(3); appointing all Plaintiff's attorneys as Class Counsel and appointing Plaintiffs as Class Representatives at a hearing set for January 15, 2020 at 9:30 a.m. before Honorable Joan E. Ericksen at the Courthouse at 300 South Fourth Street, Minneapolis, Minnesota 55147.

This Motion is based on the pleadings, files and records herein, including Plaintiffs' Memorandum of Law and the Declaration of Lee Squitieri filed in support of this Motion.

Dated: December 2, 2019

s/ Lee Squitieri
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